

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Carlos Caraballo	:	Chapter 13
	:	Case No.: 19-11511-AMC
Debtor	:	

**MOTION TO REOPEN FOR THE LIMITED PURPOSES OF AN ENTRY OF
DISCHARGE**

Debtor, Carlos Caraballo, by Attorney Brad J. Sadek, respectfully requests this Honorable Court to reopen the Chapter 13 Case and vacate the Order granting Dismissal so that a discharge can be entered, and hereby avers the following:

1. Debtor filed the instant Chapter 13 Bankruptcy on March 12, 2019.
2. After the completion of all due plan payments, the Standing Chapter 13 Trustee, Scott F. Waterman, entered a Final Report as Closed & Completed on June 8, 2021.
3. An Order was entered July 1, 2021 requiring the debtor to complete the Domestic Support Obligation Certification within 14 days.
4. On July 22, 2021, the debtor's Chapter 13 Case was closed without Discharge.
5. The debtor completed the Domestic Support Obligation Certification on July 28, 2021.
See Exhibit "A."
6. The debtor was not required to pay Domestic Support Obligations prior to filing nor during the bankruptcy.
7. The debtor paid \$8,950.00 to the Standing Chapter 13 Trustee over 28 months and has satisfied all required end of case procedure to date.

WHEREFORE, the Debtor humbly requests this Honorable Court to reopen the Chapter 13 Case for the limited purposes of entering an Order of Discharge

Dated: July 28, 2021

/s/Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for Debtor
Sadek and Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
215-545-0008